

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In Re:

iSun, Inc.

Debtor

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Chapter 11

Case Number 24-11144

Honorable Thomas M Horan

**ALLY BANK'S OBJECTIONS TO CONFIRMATION OF CHAPTER 11 PLAN AND  
SALE**

NOW COMES Creditor, Ally Bank, by and through its attorneys, Orlans PC, and hereby  
Objects to Confirmation as follows:

1. On June 3, 2024, the Debtor(s) filed a voluntary petition seeking relief under Chapter 13 of the United States Bankruptcy Code.
2. On the Petition Date, the Debtor(s) were in possession of a 2019 RAM 2500 Crew VIN No. 3C6UR5CJ4KG574292 (the "RAM 2500"), a 2019 RAM 1500 Quad VIN No. 1C6RR7FT8KS673401 (the "RAM 1500"), and a 2019 RAM Promaster City Cargo Van VIN No. ZFBHRFAB8K6N69130 (the "RAM Promaster") (together, the "Vehicles") and indebted to Ally Bank (the "Creditor") in the amount of \$12,779.24 for the RAM 2500, \$9,700.69 for the RAM 1500 and \$5,744.33 for the RAM Promaster (plus fees, costs, and interest) for these Vehicles.
3. The Vehicles were purchased on Retail Installment Sale Contracts (the "Contracts"). (Copies of the Contract is attached as Exhibit A).
4. On July 10, 2024, Debtors filed a Notice of Sale by Auction, Sale Hearing, and Designation of Stalking Horse Bidder.
5. The Sale as proposed cannot be confirmed for the following reasons:
  - a. Creditor does not agree to being included in this liquidating plan.

WHEREFORE, Ally Bank, by and through its attorneys, objects to the Sale and prays that Sale be denied.

Date: July 23, 2024  
Wilmington, Delaware

Respectfully submitted,

/s/ Elizabeth A. Trachtman

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